



1 **ROBERTO LEVERON #218596**

2 **SANTA ANA JAIL M-88**

3 **PO BOX 22003**

4 **SANTA ANA, CA 92702**

5
6 **UNITED STATES DISTRICT COURT**

7 **CENTRAL DISTRICT OF CALIFORNIA**

8 **ROBERTO LEVERON) CASE # 8:22-CV-01267-RGK-MAR**

9 **PLAINTIFF) COMPLAINT FOR DAMAGES**

10 **VS.) PURSUANT TO**

11 **CITY OF SANTA ANA, ET AL) TITLE 42 USC 1983**

12 **DEFENDANTS)**

13
14
15 **JURISDICTION**

- 16 1. This court has jurisdiction under 28 USC 1331. Federal Question jurisdiction
17 arises pursuant to 42 USC 1983.

18
19 **VENUE**

- 20
21 2. Venue is proper pursuant to 28 USC 1391 because the events giving rise to this
22 complaint happened in this district.

23
24 **PARTIES**

- 25
26 3. PLAINTIFF, ROBERTO LEVERON, incarcerated in SANTA ANA JAIL,
27 Santa Ana, California.

1 4. DEFENDANT, SANTA ANA JAIL, Santa Ana Jail, California. Sued in official
2 capacity.

3 5. DEFENDANT, CITY OF SANTA ANA, Santa Ana, California. Sued in
4 official capacity.

5 6. DEFENDANT, NAPHCARE, Santa Ana Jail, California. Sued in individual
6 capacity. NAPHCARE provides medical and dental care for the inmates housed
7 at SAJ.

8 7. DEFENDANT, SUPERVISOR MANRIQUEZ, Santa Ana Jail, California.
9 Sued in official and individual capacity.

10 8. DEFENDANT, SUPERVISOR PEREZ, Santa Ana Jail, California. Sued in
11 individual capacity. Perez is supervisor, disciplinary officer, and is supervisory
12 grievance officer.

13 9. DEFENDANT, SUPERVISOR MONREAL, Santa Ana Jail, California.
14 Monreal is supervisor and routinely handles grievances and requests during her
15 shifts.

16 10.DEFENDANT, SUPERVISOR JIRON, Santa Ana Jail, California. Sued in
17 individual capacity. Jiron is in charge of SAJ security and routinely handles
18 grievances.

19 11.DEFENDANT, CLASSIFICATION STAFF, RODRIGUEZ, Santa Ana Jail,
20 California. Sued in individual capacity.

21 12.DEFENDANT, SUPERVISOR BADGE #2475, Santa Ana Jail, California.
22 Sued in individual capacity.

23 13.DEFENDANT, SUPERVISOR S. RIVERA, Santa Ana Jail, California. Sued
24 in individual capacity.

25 14.DEFENDANT, OFFICER ORNELAS, Santa Ana Jail, California. Ornelas is
26 the floor officer.

1 15.DEFENDANT, OFFICER C. FERNANDEZ, Santa Ana Jail, California. Sued
2 in individual capacity.

3 16.DEFENDANT, OFFICER GRIJALVA, Santa Ana Jail, California. Sued in
4 individual capacity.

5 17.DEFENDANT, UNIDENTIFIED MEDICAL STAFF, Santa Ana Jail,
6 California.

7 18.DEFENDANT, NURSE RR, Santa Ana Jail, California. Sued in individual
8 capacity.

9 19.DEFENDANT, CC NURSE MANAGER, Santa Ana Jail, California. Sued in
10 individual capacity. CC Nurse Manager handles medical and dental grievances
11 on behalf of NAPHCARE and SAJ.

12 **ADMINISTRATIVE REMEDIES**

13
14 20.I have exhausted administrative remedies as required by law.
15

16 **STATEMENT OF FACTS**

17
18 21. I have been incarcerated for 78 months.

19 22.I speak very little English. My primary language is Spanish. I cannot read or
20 write English.

21 23.The law library at SAJ does not provide Spanish language materials.

22 24.NAPHCARE provides medical care for SAJ.

23 25.SAJ policy is to not allow inmates to possess medical records.

24 26.SAJ does not have any doctors on its staff, does not have adequate medical care,
25 the medical staff are not licensed to provide the care they provide here, and the
26 medical staff are not trained to provide emergency medical care. SAJ policy is

1 to not allow the transfer of inmates to an outside emergency medical facility.

2 They do not provide dental treatment.

3 27. Medical staff at SAJ provide medical care, evaluations, and diagnoses, they are
4 not trained nor licensed to provide.

5 28. SAJ does not have any doctors on its staff, does not have adequate medical care,
6 the medical staff are not licensed to provide the care they provide here, and the
7 medical staff are not trained to provide emergency medical care. SAJ policy is
8 to not allow the transfer of inmates to an outside emergency medical facility.

9 29. Since my incarceration, I have not been allowed to see a dentist, speak to a
10 dentist, or been evaluated by a dentist.

11 30. Since my arrival at SAJ, I have not seen a doctor, spoken to a doctor, or been
12 properly evaluated by a doctor. The nurses state that they can and will not do
13 anything for my dental problems.

14 31. On numerous occasions I have been denied emergency medical and dental care
15 that would have been provided to any other person with the same medical or
16 dental conditions I have, had I not been at SAJ.

17 32. Due to my medical and dental issues, any layperson would be able to come to
18 the conclusion that I needed emergency medical attention.

19 33. I have been in administrative segregation for over one year without a hearing.
20 This was not done for disciplinary reasons. I have requested from numerous
21 staff to grant me a hearing or less constrictive housing. I have requested this
22 from Perez, Jiron, Monreal, Rodriguez, and Manriquez.

23 34. On or about October 12, 2018, while incarcerated at San Bernardino County
24 Jail, I was battered by multiple deputies. This incident resulted in a neck, upper
25 back, and head injury. Due to this incident I was transferred to SAJ.

1 35. In March 2019, I arrived at Santa Ana Jail (SAJ) as a pretrial detainee pending
2 federal charges.

3 36. Since my arrival at SAJ, I have filed 100+ grievances. These grievances have
4 been for a number of issues including requests for emergency medical and
5 dental care, requests for legal assistance and law library access, lost legal mail,
6 disciplinary appeals, staff complaints, and others. For most of these grievances
7 staff has failed to return my initial copies.

8 37. These grievances are filed by the staff using a number system. The format is
9 "GI#" followed by a four digit number.

10 38. On June 14, 2019, I filed a "NAPHCARE MEDICAL DEPARTMENT SICK
11 CALL REQUEST-MANAGED BY TECHCARE" (sick call.) stating that I had
12 stomach pains and nausea. I did not receive medical treatment.

13 39. On August 13, 2019, I submitted a sick call stating that I was still having
14 stomach pains and nausea. I did not receive medical treatment.

15 40. On October 14, 2019, I filed GI# 2584 stating that I had not been receiving
16 medical attention. The response stated that I can purchase pain medication from
17 the commissary.

18 41. On November 5, 2019, I submitted a sick call due to the pain from my injury. I
19 stated that I was having trouble sleeping because of the extreme pain, stating
20 that I had not been receiving medical care. I stated that I had an infection in my
21 throat which had pus. The initial response was done by CC Nurse Manager,
22 which stated, "Scheduled to see medical. Please use sick call forms when
23 needing to see medical." I never received medical attention.

24 42. On November 25, 2019, I wrote and mailed a letter to SAJ stating that I was
25 being harassed and discriminated against by several officers here at SAJ and

1 the fact that I was not receiving responses to my grievances. I never received a
2 response to this letter although it was received by administration.

3 43. On October 1, 2020, I received a letter that back that I had mailed on April 6,
4 2020. This letter had sat in the SAJ mail room for six months. I submitted GI#
5 3194 that was forwarded to Jiron. This grievance was in regards to the legal
6 letter that was missing for six months as well as the other grievances that staff
7 fail to respond to. The response for the grievance in regards to my legal letter
8 was, "on 100520 at 1405 hours. I spoke with Leveron re this mail (sic). He
9 showed me a piece of mail he sent on 04/06/20. Per Leveron this piece of mail
10 was return (sic) to him on 10/01/20 for unknown reason. (sic) I can't explain
11 why. I never received any further responses to my grievance.

12 44. On January 26, 2021, I filed a sick call due to my ongoing stomach problems.

13 45. On January 28, 2021, I filed a sick call that stated that my pain medication was
14 not working, and that I continued to have severe neck pain, headaches, and
15 stomach pain that never goes away. The response was, "there may be another
16 medical issue. We will put you on the list." I never received treatment.

17 46. On February 1, 2021, I filed GI# 3499, stating that I had been threatened with
18 bodily harm by Officer C. Audelo. In the grievance I asked Jiron to obtain the
19 SAJ surveillance video of this event, stating the exact day and time of the
20 incident. The response stated, "Incident will be reviewed." There was never any
21 investigation into this matter.

22 47. On February 13, 2021, I submitted a sick call stating that I was having pain to
23 the right side of my chest, liver pain, and bloated stomach. The response was,
24 "we will send your concerns to the provider." I never received medical attention
25 for this.

1 48. On February 17, 2021, I filed GI# 3535, stating that I was again threatened by
2 Audelo due to the grievance filed regarding her earlier threats against me. This
3 grievance was forwarded to the supervisor and never responded to or
4 investigated.

5 49. On February 24, 2021, I submitted a sick call due to my ongoing stomach
6 problems. The response from medical staff stated that I need to drink lots of
7 water.

8 50. On or about March and April 2021, Officer Ornelas began making sexual
9 comments to me on several occasion. I reported these incidents to supervisors.
10 On more than one occasion he asked me if I wanted to kiss. One another
11 occasion, while I was working out inside of my cell, Ornelas attempted to come
12 into my cell stating, "I'll show you how it's done." Each time I told him that I
13 was not interested and that I am not homosexual. From then on, Ornelas
14 continued to make sexual advances to me. He began taking retaliatory actions
15 against me because I attempted to have him investigated and stop his sexual
16 advances.

17 51. On March 30, 2021, I file GI# 3610, stating that Ornelas had been sexually
18 harassing me. I provided the dates and times of the incidents so the supervisors
19 could obtain the SAJ audio and video surveillance. S. Rivera responded that
20 they would "review the incident and take action as needed". Rivera stated that
21 no matter what they found they would never do anything to Ornelas. No
22 investigation was ever conducted. Ornelas still works in my housing unit.

23 52. On March 31, 2021, I submitted a request for a Spanish language Title 15. The
24 response from Badge # 2475 stated, "BSCC does not make a Spanish version
25 of Title 15".

1 53. On April 12, 2021, I filed GI# 3642 stating that I had been receiving sexual
2 harassment from Ornelas. He made several sexual comments to me on multiple
3 occasions on multiple occasions. I asked the supervisors to obtain the audio and
4 video surveillance regarding these incidents. No investigation into these matters
5 was ever conducted.

6 54. On May 3, 2021, I submitted a sick call stating that I have been having severe
7 mouth pain, toothaches, and an infection in my mouth. The response stated that
8 I would be placed on the dental list. There is no dentist at SAJ. I have not seen
9 a dentist since my arrival.

10 55. I have submitted dozens of sick call requests and grievances to obtain dental
11 care. I have never received dental care here.

12 56. On July 9, 2021, I submitted a sick call stating that I still had not received
13 treatment for my neck injury since my arrival despite the fact that I was sent
14 here due to the injury. The response was, "Please fill out the release of
15 information so we can get records related to your injury. Once we have the
16 records the provider can review. Tylenol as needed x5 days. Also ask for your
17 trazadone @ night for help sleeping."

18 57. Due to the continued pain and it causing me trouble sleeping, the nurse and
19 NAPHCARE placed me on trazadone, which is a psychiatric medication. I did
20 not report psych problems.

21 58. On July 11, 2021, I submitted a sick call stating that Tylenol was not helping
22 my neck pain. The response was they would notify the provider.

23 59. On November 18, 2021, I submitted a sick call stating that I had severe stomach
24 problems, pain, and constipation. Nurse RR refused to help me.

25 60. On November 21, 2021, I informed Nurse Jonathon that I still have extreme
26 stomach pains that are not being treated. He did not help me.

1 61. On November 22, 2021, I filed GI# 4372 to Jiron stating that staff members
2 have provided my personal information to other inmates. This puts my life at
3 risk since I am in protective custody. Staff did this in retaliation. I asked for this
4 matter to be investigated. I have seen staff do this to other inmates as well. An
5 investigation was never done by Jiron. He is in charge of security so this is his
6 duty.

7 62. On December 13, 2021, I filed a sick call due to my ongoing stomach problems.

8 63. On January 2, 2022, I notified medical that I had found out that my pain
9 medication can cause stomach problems. The response was, "We will notify the
10 provider."

11 64. On January 6, 2022, I submitted a sick call stating that I'm still in pain, have
12 received no treatment, and can I see a doctor. The response stated, "Concern
13 addressed to the provider. Is Tylenol helping at all?" although I have submitted
14 dozens of sick call requests stating that I was in pain and Tylenol was not
15 helping.

16 65. On January 24, 2022, I was speaking with Officer C. Fernandez. Fernandez was
17 yelling at me and threatening me. I repeatedly asked Fernandez to stop.

18 66. On January 24, 2022, I was placed on disciplinary detention without due
19 process by Perez. I did not receive a proper hearing. I remained on detention for
20 a total of 9 days. This was done in retaliation for the incident with Fernandez.
21 Due to this incident and the detention I filed GI# 4561. This grievance was
22 never responded to and my detention was never reviewed.

23 67. On March 18, 2022, I sent a grievance to Manriquez, via USPS mail, stating
24 that I had not received a complete response to any of my grievances.

25 68. On May 18, 2022, I filed GI# 4929, stating that the grievances are not being
26 completed, I am being denied legal access, and this was preventing me from

1 getting the medical and dental attention I needed as well as preventing my
2 access to the courts to gain medical and dental attention.

3 69. Defendant, Perez, is also the supervisory grievance officer for SAJ. It is his duty
4 to handle and process all of the grievances here at SAJ.

5 70. Perez is also the disciplinary Hearing Officer. He handles the grievances for his
6 own disciplinary hearings.

7 71. City of Santa Ana, Santa Ana Jail, Manriquez, Perez, Monreal, and/or Jiron, do
8 not respond to the grievances, do not provide copies of grievances, and ignores
9 grievances so as to prevent my access to the courts, prevent my access to
10 medical and dental care, and to conceal misconduct by SAJ staff as reported in
11 my grievances.

12 72. These actions are done with illegal, sadistic, and malicious intent.

13 73. The customs and policy pertaining to the grievances, medical and dental
14 request, and inmate request forms cause staff here at SAJ to forward any
15 requests and grievances to Perez or Monreal because they know that Perez and
16 Monreal will deny these requests. This causes SAJ staff to deny legitimate
17 requests and grievances so that they don't have to do the work. Defendants
18 purposely prevent inmates from obtaining proper medical access, court access,
19 and legal access by preventing the proper use of the grievance system.

20 74. City of Santa Ana, SAJ, and supervisory staff have been made aware of the
21 misconduct and violations of constitutional law, federal and state and
22 departmental policy.

23 75. There is a culture of misconduct in SAJ that allows these actions to take place.

24 76. Manriquez, Perez, Monreal, and Jiron routinely discard grievances and do not
25 investigate officers and/or staff misconduct so as to cover up and suppress these
26 acts of misconduct.

1 77. Since my arrival, not one of the 100+ grievances I have filed has been
2 completed according to departmental policy. I have not received a response to
3 any of my grievances, not one of the 100+, from Perez, Jiron, Rodriguez,
4 Monreal, or any other staff member.

5 78. I am currently housed in extremely restricted housing in administrative
6 segregation. I am given very minimal time outside of my cell, not provided any
7 legal assistance, and given minimal access to the phones.

8 79. The policy here is for us to receive three hours a week of outside recreation, as
9 well as shower, phones, and access to the phone for legal calls as allowed by
10 the penal code.

11 80. We are only allowed two phone calls per day regardless of how long these calls
12 last. The maximum time for each call is 15 minutes. Our calls are routinely
13 disconnected.

14 81. We are routinely denied full access to the recreation yard, legal phone calls, and
15 showers as allowed by policy and law.

16 82. The procedure for obtaining a non-recorded legal call is that I must submit a
17 request with the attorney's information to SAJ staff. They review the request
18 and if they approve the request they will allow the non-recorded calls to the
19 attorney listed in the request. However, even if these requests are approved, it
20 can be several months before they are approved. This prevents me from
21 obtaining legal consultations and/or speaking with my recently assigned
22 criminal defense attorney by phone.

23 83. SAJ provides no means of legal assistance and refuses to assist me with the
24 preparation of any of my legal materials for my criminal cases. This was told to
25 me multiple times on inmate request forms. I have filed multiple grievances
26 regarding this issue.

1 84. Upon the initial intake and booking procedures, I was interviewed by medical
2 staff at SAJ. I notified medical staff of my condition. I informed medical staff
3 that I was beaten by the deputies at the San Bernardino County Jail just prior to
4 my transfer here. I informed them that I had a neck injury and had severe neck
5 and upper back pain as well as very bad headaches. Medical staff asked me to
6 sign the medical records release forms for each facility that had treated me for
7 my condition. I filled out and signed the required forms for SAJ and
8 NAPHCARE to obtain my medical records.

9 85. Since my arrival at SAJ I have not spoken to a doctor, been seen by a doctor,
10 been evaluated by a doctor, or provided any emergency medical or dental care
11 despite my life threatening and increasingly painful conditions.

12 86. All defendants in this complaint are in contracts to provide services for my
13 medical care and pretrial detention. The defendants are in breach of these
14 contracts.

15 87. The pain medication I have been placed on for several years now by medical
16 staff, the manufacturer of the medication, Johnson and Johnson, states that the
17 medication should not be taken for more than ten days. It can cause ulcers of
18 the stomach, permanent liver damage, and even death. The staff refuses me any
19 other medical treatment.

20 88. I am in imminent danger of serious injury.

21 **CLAIM I**

22 89. Defendants City of Santa Ana, Santa Ana Jail, NAPHCARE, Perez, Manriquez,
23 Unidentified Medical Staff, RR, and CC Nurse Manager, violated my 8th
24 amendment right with deliberate indifference to my medical needs by
25 knowingly and willingly refusing to provide me medical care, emergency
26 medical care, prescribed medications, and refusing allow me access to said care.

1 Defendants prevented me from obtaining medical care, interfered with
2 prescribed medical care, failed to provide adequate staff, failed to provide
3 qualified staff, maintain policies that interfere with adequate medical care, fail
4 to remedy unlawful conditions that they are aware of, fail to carry out their
5 responsibilities to make adequate medical care available, and maintaining
6 policies that allow such. These policies and custom are used by all defendants
7 in this claim. This act is continuing. The defendants either participated in the
8 act, were aware of the act and/or failed to intervene, and/ or were aware of the
9 act and failed to remedy.

10
11 **CLAIM II**

12 90. Defendants City of Santa Ana, Santa Ana Jail, Perez, Monreal, Jiron, and
13 Manriquez violated the Due Process Clause by knowingly and willingly failing
14 to provide me with legal assistance, preventing me from gaining legal
15 assistance, and failing to intervene in the violation of this right. Defendants
16 purposely prevented my access to the courts, prevented me from consulting
17 with my attorney, prevented me from obtaining medical and dental care, as well
18 as pursuing litigation in regards to the claims made in this complaint. This act
19 is continuing. The defendants either participated in the act, were aware of the
20 act and/or failed to intervene, and/ or were aware of the act and failed to remedy.

21 **CLAIM III**

22 91. Defendants City of Santa Ana, Santa Ana Jail, Perez, Monreal, Jiron, Rivera,
23 Manriquez, and Orenelas committed violations of the California Tort of Sexual
24 Harassment by knowingly and willingly making sexual comments to me against
25 my will on multiple occasions and failing to intervene in this act or investigate

1 this act. This act is continuing. The defendants either participated in the act,
2 were aware of the act and/or failed to intervene, and/ or were aware of the act
3 and failed to remedy.

4 **CLAIM IV**

5 92.Defendants City of Santa Ana, Santa Ana Jail, NAPHCARE, CC Nurse
6 Manager, Nurse RR, and Unidentified Medical Staff committed violations of
7 the California Tort Medical Malpractice. Defendants, at all times during the
8 incidents in this complaint, practiced medicine they are not licensed or trained
9 for, prescribed treatments and medications they are not licensed or trained for,
10 and/or made medical decisions that they are not licensed or trained for. This act
11 is continuing. The defendants either participated in the act, were aware of the
12 act and/or failed to intervene, and/or were aware of the act and failed to remedy.

13 **CLAIM V**

14 93.Defendants City of Santa Ana, Santa Ana Jail, and Perez violated my 14th
15 amendment right by knowingly and willingly sentencing me to disciplinary
16 detention and violated the Due Process Clause. This act is continuing. The
17 defendants either participated in the act, were aware of the act and/or failed to
18 intervene, and/ or were aware of the act and failed to remedy.

19 **CLAIM VI**

20 94.Defendants City of Santa Ana, Santa Ana Jail, and Perez violated my 14th
21 amendment right by knowingly and willingly placing me in administrative
22 segregation for more than a year without due process violating the Due Process
23 Clause. The defendants either participated in the act, were aware of the act
24 and/or failed to intervene, and/ or were aware of the act and failed to remedy.

CLAIM VII

95. Defendants City of Santa Ana, Santa Ana Jail, Perez, Monreal, Manriquez, Jiron committed violations of the California Tort Negligent Supervision due to the negligent hiring, training, and supervision at all times mentioned in this complaint. This is a continuing act. The defendants either participated in the act, were aware of the act and/or failed to intervene, and/or were aware of the act and failed to remedy.

CLAIM VIII

96. Defendants City of Santa Ana, Santa Ana Jail, NAPHCARE, Unidentified Medical Staff, and CC Nurse Manager committed violations of the California Tort Negligent Supervision due to the negligent hiring, training, and supervision at all times mentioned in this complaint. This is a continuing act. The defendants either participated in the act, were aware of the act and/or failed to intervene, and/or were aware of the act and failed to remedy.

CLAIM IX

97. Defendants City of Santa Ana, Santa Ana Jail, NAPHCARE, Perez, Monreal, Manriquez, Jiron, Rodriguez, Supervisor Badge #2475, Rivera, Unidentified Medical Staff, and CC Nurse Manager committed violations of the California Tort Negligence at all times mentioned in this complaint. This is a continuing act. The defendants either participated in the act, were aware of the act and/or failed to intervene, and/or were aware of the act and failed to remedy.

CLAIM X

98. Defendants City of Santa Ana, Santa Ana Jail, NAPHCARE, Perez, Monreal, Manriquez, Jiron, Rodriguez, Supervisor Badge #2475, Rivera are in a continued civil and criminal conspiracy with the intent of violating my

1 constitutional rights by using the overt acts mentioned in this complaint in the
2 “Statement of Facts”. This is a continuing act. The defendants either
3 participated in the act, were aware of the act and/or failed to intervene, and/or
4 were aware of the act and failed to remedy.

5 **RELIEF REQUESTED**

6 99. Compensatory damages, including general, punitive, and/or special damages,
7 according to proof and allowed by law.

8 100. Due to my ongoing and worsening medical and dental conditions, the court
9 grant my attached “Request to Proceed Without Prepayment of Filing Fees”. I
10 am in imminent danger of serious injury.

11 101. Court assign me counsel to represent me for these matters.

12 102. The court issue a declaratory judgement to the defendants in regards to these
13 matters to ensure that they are aware of my constitutional rights and to ensure
14 those rights remain intact.

15 103. The court issue a preliminary injunction to ensure that I am receiving proper
16 medical and dental care as required by law, and to ensure my other rights related
17 to this complaint are intact.

18 104. The court assign a Special Master to investigate these matters and to ensure
19 all constitutional rights in regards to these matters are and continue to remain
20 intact.

21 105. The court grant my request for appointment of counsel and assign me a
22 Spanish speaking attorney.

23 106. The court appoint me a Spanish speaking translator.

24 107. The court allow me to amend this complaint if necessary to comply with the
25 law, and to allow me to amend at a later time when the other defendants and
26 claims can be identified.

108. Any other relief the court deems necessary or that is allowed to me by law.

DEMAND FOR JURY TRIAL

109. Plaintiff hereby demands a jury trial on all issues raised in this complaint.

110. I, ROBERTO LEVERON, PLAINTIFF, in the above entitled action, do hereby reaffirm the above and swear the above to be true under penalty of perjury.

x 

x Dated: 06-29-2022

ROBERTO LEVERON

PLAINTIFF

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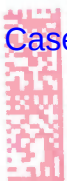
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ROBERTO LEVERON VS. CITY OF SANTA ANA, ET AL
CASE #

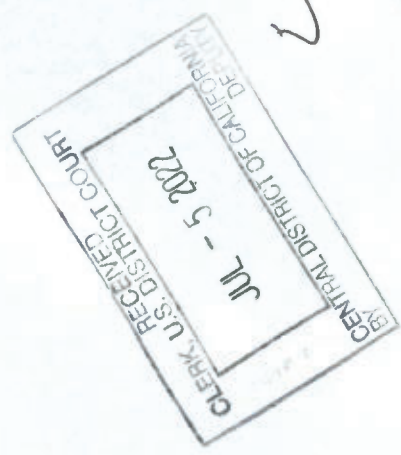
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RETURN
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Santa Ana Jail Correspondence

02314475-63001



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SANTA ANA JAIL M88
P.O. Box 22003
SANTA ANA, CA 92702

7019 9970 0000 1110 4576



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